



the court from which the case is being removed. Schiff Hardin is separately filing a signed corporate disclosure statement that complies with Rule 7.1 of the Federal Rules of Civil Procedure.

**THE VENUE REQUIREMENT IS MET**

5. The venue requirement is met under 28 U.S.C. § 1441(a) because this Court is the United States District Court for the district and division corresponding to the place where the Removed Action was pending.

**DIVERSITY OF CITIZENSHIP EXISTS  
BETWEEN THE PROPERLY JOINED PARTIES**

6. This is a civil action that falls under the Court's original jurisdiction under 28 U.S.C. § 1332 (diversity of citizenship) and is one that may be removed to this Court based on diversity of citizenship under 28 U.S.C. §§ 1441 and 1446.

7. As admitted in Plaintiff's Original Petition ("Petition") ¶¶ 5, Plaintiff is an "Irish insurance company, with its principal place of business in Dublin, Ireland."

8. Schiff Hardin is a limited liability partnership organized and existing under the laws of the State of Illinois. None of Schiff Hardin's partners is a citizen of Texas. The attached Exhibit B identifies each of Schiff Hardin's partners and their respective state of citizenship.

11. Because the Plaintiff is a foreign citizen, and Schiff Hardin (the only defendant) is not a citizen of Texas or of Ireland, complete diversity of citizenship exists under 28 U.S.C. § 1332.

**THE AMOUNT-IN-CONTROVERSY REQUIREMENT IS SATISFIED**

13. The monetary value of the amount in controversy exceeds \$75,000, exclusive of interest and costs. In the Petition at page 1, Plaintiff alleges that it seeks "monetary relief over \$1,000,000."

15. The Petition included a request for a jury trial, *see* Petition, ¶ 31, but Plaintiff failed to pay the jury fee.

### **REMOVAL IS TIMELY**

3. Removal is timely filed under 28 U.S.C § 1446(b)(2)(B), as this notice was filed within 30 days of receiving service of the initial pleading and summons.

### **FILING OF REMOVAL PAPERS**

16. Under 28 U.S.C. § 1446(d), written notice of the removal of this action has been given to Plaintiff's counsel, and a Notice to the Clerk of Filing Notice of Removal is being filed with the clerk of the 71st Judicial District Court, Harrison County, Texas. A true and correct copy of this Notice is attached as Exhibit C.

### **CONCLUSION**

Defendant Schiff Hardin, LLP removes this action from the 71st Judicial District Court, Harrison County, Texas, to this Court.

Respectfully submitted,

/s/ George M. Kryder  
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*Attorneys for Defendant Schiff Hardin, LLP*

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing instrument was served on all counsel of record on May 15, 2017, through the CM/ECF system.

/s/ George M. Kryder  
George M. Kryder